

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION

GULF STATES REORGANIZATION)	
GROUP, INC.,)	
)	
Plaintiff,)	
v.)	No. 1:02-cv-2600-RDP
)	
NUCOR CORPORATION,)	
)	
Defendant.)	
_____)	

**DEFENDANT NUCOR'S RESPONSE TO GSRG'S
RENEWED REQUEST FOR ORAL HEARING
ON OBJECTIONS TO SPECIAL MASTER'S REPORTS**

Defendant Nucor Corporation ("Nucor") respectfully submits that a hearing is unnecessary concerning the parties' objections to the Special Master's Fourth Report (Dkt #305). The pending objections include Nucor's "Protective Objection" regarding admissibility of Dr. Crandall's testimony (Dkt #310). If an oral hearing were to be held, equity and fairness dictates that Nucor's "Protective Objection" should be heard. The Court already has extensive briefing from both parties on all of the issues raised. For the reasons set forth in Nucor's prior submissions, the Special Master's Fourth Report regarding summary judgment should be summarily adopted and confirmed by the Court without further delay.

Respectfully submitted,

/s/ R. Marcus Givhan

R. Marcus Givhan, Esq.
Joseph W. Carlisle, Esq.
Clark R. Hammond, Esq.
Johnston Barton Proctor & Rose
LLP
Colonial Brookwood Center
569 Brookwood Village, Suite 901
Birmingham, Alabama 35209

Bert W. Rein, Esq.
John B. Wyss, Esq.
Josh Abbott, Esq.
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

*Attorneys for Defendant Nucor
Corporation*

CERTIFICATE OF SERVICE

I hereby certify that, on this 18th day of March, 2011, I have filed the above and foregoing document with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to all counsel of record, including:

Philip C. Jones, Esq.
Greenburg, Spence & Taylor, PC
51 Monroe Place, Suite 707
Rockville, Maryland 20850-2406

Special Master James F. Rill, Esq.
HOWREY LLP
1299 Pennsylvania Ave. N.W.
Washington, DC 20004-2402

s/ R. Marcus Givhan
Of Counsel